

United States v. Edward S. Adams  
Case No. 17-64 (DWF/KMM)

Exhibit 7



**FOSTER & BREVER, PLLC**  
ATTORNEYS AT LAW

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November 24, 2014

Internal Revenue Service  
Criminal Investigation  
ATTN: Offshore Voluntary Disclosure Coordinator  
Philadelphia Lead Development Center  
1-D04-100  
2970 Market St.  
Philadelphia, PA 19104

By Certified Mail

RE: Ed Adams, et ux.  
SSNs:

Dear Sir or Madam:

On behalf of the above-referenced taxpayers, and pursuant to your instructions in your Nov. 17, 2014 letter, we hereby submit the Domestic Voluntary Disclosure letter.

Sincerely,

Thomas E. Brever

TEB/skb

Enclosure

cc: Clients

**Domestic Voluntary Disclosure**

Internal Revenue Service  
Criminal Investigation  
ATTN: Voluntary Disclosure Coordinator  
Philadelphia Lead Development Center  
2970 Market Street, BLN 1-D04-100  
Philadelphia, PA 19104

Dear Voluntary Disclosure Coordinator:

To assist in a timely determination of my (our) acceptance into the Domestic Voluntary Disclosure Program, I (we) submit the following items:

1. This voluntary disclosure relates to the tax liability of the following entity and/or person(s) (Please add an attachment, if necessary):

	Primary Taxpayer	Secondary/Spouse
Complete Name	Edward Adams	Denise Adams
Tax Identification Number		
DOB		
Address		
City/State/Zip	Minneapolis, MN 55419	Minneapolis, MN 55419
Current Occupation	Professor	

2. Please contact the following person(s) regarding this voluntary disclosure.

- a. ☒ The person named below represents me (us). I (we) have attached a Form 2848.

Name	Thomas E. Brever
Address	2812 Anthony Lane S., Suite 200
City/State/Zip	St. Anthony, MN 55418

- b. ☐ I am (we are) not represented; please contact me at the address above with any questions or concerns regarding this voluntary disclosure.

3. I (we) am declaring the following statements to be true or false:

- a. False The Internal Revenue Service has notified me (us) or a related entity (entities) that it intends to commence an audit or criminal investigation. The details are explained below.
- b. False I (we) am or a related entity (entities) is currently under audit or criminal investigation by the Internal Revenue Service. The details are explained below.

- c. False I (we) am currently under criminal investigation by a law enforcement authority. The details are explained below.
- d. False The source of the income I (we) wish to report is derived from an illegal activity. The details are explained below.

Explanation for items a through d above:

4. The reason I (we) am submitting this voluntary disclosure is explained below:

Upon review of prior transactions, we determined that income from sales of securities had not been included in income in 2008 - 2010. The amended returns include the previously omitted capital gain income.

5. I (we) estimate the total annual unreported income during the disclosure years:  
(Input tax years on first line and check the appropriate box)

Unreported income	2008	2009	2010		
\$0 to \$100,000	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$100,000 to \$1,000,000	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$1,000,000 to \$2,500,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$2,500,000 to \$10,000,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Greater than \$10,000,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. The source of the unreported income is described below: (i.e. wages, dividends, self-employment, investments, sale of property)

Capital gains from sale of securities.

7. The type of tax return(s) and the type of tax(es) involved is listed below:

Return	Tax	Tax Year(s)
i.e. Form 1040	Income	2008 - 2010
1040	Income	2008 - 2010

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IRS VDP INCOMING 3

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8. The following person(s) and title or entity (entities) is affiliated with the unreported income. (Their formal structure (i.e. if a corporation, foundation, or trust), and the nature of their relationship to the unreported income (i.e. owner, power of attorney, parent entity of corporate account holder, etc.))

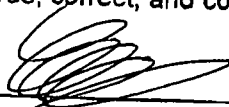
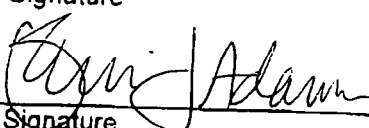
Person/Entity	Structure	Relationship
i.e. ABC Company, Inc	Corporation	Employer
ADR Investments, LLC	LLC	Investment Company
Apollo Diamond, Inc.	Corporation	Investment Company

9. My (our) tax returns were prepared utilizing the following tax avoidance strategy:  
N/A.

10. I (we) met or spoke with the following representative(s) regarding the above tax avoidance strategy.  
N/A.

By signing this document, I(we) certify that I(we) am(are) willing to continue to cooperate with the Internal Revenue Service, including assessing my(our) income tax liabilities and making good faith arrangements to pay all taxes, interest, and penalties associated with this voluntary disclosure.

Under penalties of perjury, I(we) declare I(we) have examined this document and accompanying statements, and to the best of my(our) knowledge and belief, they are true, correct, and complete.

	Edward Adams	11-21-14
Signature	Print Name	Date
	Denise Adams	11/21/14
Signature	Print Name	Date

All taxpayers must sign this document to be considered for acceptance into the IRS Voluntary Disclosure Program. The IRS reserves the right to make further contacts with the taxpayer(s) to clarify their submission.